

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MANISHA SINGH

Plaintiff,

v.

MEMORIAL SLOAN KETTERING CANCER
CENTER, SLOAN KETTERING INSTITUTE
FOR CANCER RESEARCH, DR. N.V.
KISHORE PILLARSETTY, and DR. STEVEN
M. LARSON,

Defendants.

Case No. 17-cv-3935-GBD-KNF

ECF CASE

AMENDED JOINT PRETRIAL ORDER

Pursuant to the Pretrial Procedures of United States District Court Judge George B. Daniels, plaintiff *pro se* Manisha Singh (“Plaintiff” or “Ms. Singh”) and defendants Memorial Sloan Kettering Cancer Center (the “Center” or “MSKCC”), Sloan Kettering Institute for Cancer Research (“SKI”), Dr. N.V. Kishore Pillarsetty (“Pillarsetty”) and Dr. Steven M. Larson (“Larson”) (collectively, the “Defendants”), by and through their attorneys, hereby submit this Amended Joint Pretrial Order:

A. FULL CAPTION OF THE ACTION

The full caption of the action is set forth above.

B. TRIAL COUNSEL

1. *Plaintiff’s Counsel*

Not applicable; Plaintiff is *Pro Se*

Manisha Singh
475 Main Street, Apt. 12K
New York, New York 10044
Telephone: (718) 679-7326
manisharaj@gmail.com

2. *Defendants' Counsel*

Terri L. Chase
JoAnna Tonini
JONES DAY
250 Vesey Street
New York, New York 10281
Telephone: (212) 326-3939
Fax: (212) 755-7306

C. BASIS FOR SUBJECT MATTER JURISDICTION

1. *Plaintiff's Statement as to Basis for Subject Matter Jurisdiction*

This Court has original subject matter jurisdiction with respect to this action pursuant to 28 U.S.C. § 1332, as there exists complete diversity of citizenship between Plaintiff and Defendants and the amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000), exclusive of interest and costs. This Court also has subject matter jurisdiction pursuant to 28 U.S.C. §1331, with federal questions involving Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.* An express grant of federal court jurisdiction over these federal claims is found at 42 U.S.C. § 2000e-5(f)(3).

2. *Defendants' Statement as to Basis for Subject Matter Jurisdiction*

This Court has original subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331. Plaintiff has alleged federal questions arising under Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.* See also 42 U.S.C. § 2000e-5(f)(3) ("Each United States district court . . . shall have jurisdiction of actions brought under this subchapter.").

D. SUMMARY OF CLAIMS AND DEFENSES

1. *Plaintiff's Summary of Claims and Defenses*

The following of Plaintiff's claims remain to tried: (1) unlawful discrimination in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.* ("Title VII")

against MSKCC and SKI; (2) violation of the New York State Human Rights Law, New York Executive Law §§ 290 *et seq.* (the “NYSHRL”) against all Defendants; (3) violation of the New York City Human Rights Law, Administrative Code §§ 8-107 *et seq.* (the “NYCHRL”) against all Defendants, (4) intentional infliction of emotional distress (“IIED”) against Defendant Pillarsetty; and (5) civil battery against Defendant Pillarsetty.

The Court previously dismissed Plaintiff’s claims of: (1) defamation *per se*; (2) negligent infliction of emotional distress; (3) IIED against Defendants MSKCC, SKI, and Larson; and (4) civil battery against Defendants MSKCC, SKI, and Larson following Defendants’ unopposed Motion for Partial Summary Judgment.

2. *Defendants’ Summary of Claims and Defenses*

In the Amended Complaint, Ms. Singh alleged that Defendants discriminated against her because of her gender (female), including *quid pro quo* sexual harassment by Defendant Pillarsetty, hostile work environment, and disparate treatment. Ms. Singh also alleged that Defendants retaliated against her for reporting the sexual harassment. Ms. Singh further alleged common law tort claims of civil battery, intentional infliction of emotional distress (“IIED”), and negligent infliction of emotional distress (“NIED”) against all Defendants. Lastly, Ms. Singh alleged claims of defamation *per se* against Defendants Pillarsetty and Larson. Ms. Singh’s discrimination and retaliation claims are based on Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.* (“Title VII”), New York State Human Rights Law, New York Executive Law §§ 290 *et seq.* (the “NYSHRL”), and the New York City Human Rights Law, New York City Administrative Code §§ 8-107 *et seq.* (the “NYCHRL”).

Following the close of discovery, Defendants moved for and were granted summary judgment on Plaintiff’s defamation *per se* and NIED claims, and on Plaintiff’s civil battery and

IIED claims as to Defendants MSKCC, SKI, and Larson. Accordingly, the claims to be tried are discrimination and retaliation, civil battery against Defendant Pillarsetty, and IIED against Defendant Pillarsetty.

By way of background, in August 2014, Ms. Singh began working at the Center as a postdoctoral research fellow in the laboratory of Defendant Larson where she was directly supervised by Defendant Pillarsetty. As a postdoctoral fellow, Ms. Singh was appointed to one year terms that were subject to annual reappointment. Throughout Ms. Singh's time at the Center, she consistently failed to meet performance expectations and was chronically dependent on others for help. Defendant Pillarsetty repeatedly and contemporaneously informed Ms. Singh of his concerns regarding her performance, both verbally and in writing. Despite coaching and counseling, Ms. Singh's performance not only failed to improve, but deteriorated. Ms. Singh also had attendance issues that were significant enough that she was formally warned on January 22, 2016. Though Defendant Pillarsetty warned Ms. Singh that she might not be reappointed due to her deteriorating performance, Ms. Singh's performance deficiencies continued.

Prior to the end of Ms. Singh's second year, Defendant Pillarsetty concluded that Ms. Singh's contract should not be renewed because of her consistently substandard performance and inadequate research progress. In or about June 2016, Defendants Pillarsetty and Larson conferred and agreed not to reappoint Ms. Singh. In or about July 2016, the Center informed Ms. Singh that her contract would not be renewed and her employment would conclude at the end of September 2016 if she did not find an alternate position within the Center before that time.

After being informed of her termination, on or about July 7, 2016, Ms. Singh submitted a complaint to the Center, alleging that the failure to reappoint her was due to gender discrimination and retaliation. Ms. Singh additionally claimed for the first time that Defendant

Pillarsetty, an Indian man, had been habitually abusive and unjust to her because she was an Indian woman. Ms. Singh further claimed that she had reported this abuse to Defendant Larson, and that, in retaliation, Defendant Pillarsetty sought to prevent her reappointment. The Center began a thorough, good faith investigation into the basis of the decision not to renew Ms. Singh's appointment. Meanwhile, Ms. Singh attempted to secure an alternate position at the Center and expressed interest in remaining in her current position under Defendant Pillarsetty. Ms. Singh gave no indication in her initial complaint that Defendant Pillarsetty's alleged abuse involved sexual harassment.

The Center's investigation confirmed that the decision not to reappoint Ms. Singh was made on the basis of her deficient performance and that Ms. Singh had not complained of discrimination prior to being informed of her non-reappointment. The Center informed Ms. Singh of its findings on or about August 10, 2016. On or about August 22, 2016, Ms. Singh amended her internal complaint to include, for the first time, an allegation that Defendant Pillarsetty had sexually harassed her. In response, the Center timely initiated another investigation and approved Ms. Singh for a paid leave of absence lasting until her September 30, 2016 end date, during which time she could continue her search for alternative employment with the Center or another employer. After interviewing multiple witnesses, the Center found, as with the initial investigation, no evidence to support Ms. Singh's latest allegations and again confirmed that Ms. Singh's non-renewal was appropriate. Ms. Singh's employment at the Center ended effective approximately the third week in October 2016. Ms. Singh claims that the decision not to her renew her appointment with the Center was discriminatory and retaliatory.

Defendants will assert the following defenses against Ms. Singh's discrimination, retaliation, civil battery, and IIED claims at trial. First, Defendant Pillarsetty vigorously denies

the allegations and has no history of any such complaints being made against him. Second, Defendants will demonstrate that Ms. Singh was not subject to discriminatory or hostile conditions at work. Beyond Ms. Singh's own assertions, nothing in the factual record supports the conclusion that she was judged or treated differently because of her gender. Third, Defendants will argue that they had a legitimate, non-discriminatory and non-retaliatory reason for not renewing Plaintiff's appointment, which was not a pretext for retaliation. The record supports Defendants' position that Ms. Singh's appointment was not renewed solely because of her consistent failure to meet applicable scientific and professional standards, which are supported by contemporaneous written and verbal warnings.

E. TRIAL BY JURY

All parties agree that the case will be tried with a jury. Plaintiff anticipates 3 trial days for her case-in-chief. Defendants anticipate 5 trial days for their case-in-chief. The parties request 10 jurors. Plaintiff requests a majority vote, and Defendants request that the jury vote be unanimous, therefore, pursuant to Fed. R. Civ. P. 48(b), the vote must be unanimous.

F. TRIAL BEFORE A MAGISTRATE

All parties do not consent to trial before the designated magistrate judge.

G. STIPULATIONS OR AGREED STATEMENTS OF FACT OR LAW

1. Plaintiff, Manisha Singh, is a woman of Indian citizenship.
2. Defendant, Memorial Sloan Kettering Cancer Care Center (the "Center" or "MSKCC"), is a not-for-profit corporation that employs more than 10,000 employees.
3. Defendant, Sloan Kettering Institute for Cancer Research ("SKI"), is the experimental research arm of the Center.

4. Defendant, N.V. Kishore Pillarsetty, is an employee of the Center and holds the position of Associate Attending Radiochemist.

5. Defendant, Steven M. Larson, is an employee of the Center and holds the positions of Member and Lab Head in the Molecular Pharmacology Program, the Donna and Benjamin M. Rosen Chair in Radiology, and Attending in Molecular Imaging and Therapy Service, Department of Radiology.

6. Plaintiff has not alleged that any person other than Defendant Pillarsetty harassed her, propositioned her, assaulted her, or touched her against her will.

H. WITNESSES¹

1. *Plaintiff's Witness List*

| Order | Witness | Mode of Testimony | Summary of Testimony & Relevance to Issues on Trial |
|--------------|----------------|--------------------------|--|
| 1 | Manisha Singh | In person | Dr. Manisha Singh worked under Dr. Pillarsetty throughout her employment at the Center. She will testify to her sexual harassment and discrimination working at MSKCC. She will also testify how the center has handled the situation unethically and unlawfully. Dr. Singh's testimony is relevant to establish that Plaintiff was subject to discriminatory or hostile work conditions or unwanted physical contact, to demonstrate the Center's inappropriate, inadequate, investigation to bury the real reason in front of the law. |
| 2 | Meta lackland | In person | Ms. Lackland is a longtime coworker and friend of Dr. Singh. She knows Dr. Singh since 2006. She will testify in person about her conversations with Dr. Singh about the sexual harassment Dr. Singh was experiencing throughout her employment at the Center. She has been the great support system for Dr. Singh to look for the proper solution which didn't up as expected. She knows every part of Dr. |

¹ The parties reserve their rights to move *in limine* to exclude witnesses in the event that they cannot amicably resolve any disputes concerning proposed testimony. As the purpose of the parties' Amended Joint Pretrial Order is solely to correct certain issues with—and conform Defendants' objections to—Plaintiff's exhibit list (Dkt. No. 75), Defendants additionally reserve their rights to move *in limine* to exclude any witnesses who are not listed in the parties' Joint Pretrial Order filed on January 30, 2020. (Dkt. No. 74.)

| | | | |
|---|------------------|-----------|--|
| | | | Singh's life and personality. She will also testify the effect of this experience on Dr. Singh's well-being and social life. |
| 3 | Honor Finnegan | In person | Ms. Finnegan is a meditation trainer. She trained Dr. Singh for meditation practice during her difficult time at MSKCC. She will testify in person about her conversations with Dr. Singh about the sexual harassment Dr. Singh was experiencing throughout her employment at the Center. She will also testify the effect of this experience on Dr. Singh's well-being and social life. She will testify the effect of this experience on Dr. Singh's parents and other family members. |
| 4 | Michelle Hassine | In Person | Ms. Hassine is Economist at the Monetary Fund (IMF). She will testify about her conversations with Dr. Singh about the sexual harassment Dr. Singh was experiencing throughout her employment at the Center. She will also testify the effect of this experience on Dr. Singh's parents and other family members. |
| 5 | Rani Shukla | In person | Ms. Shukla is a longtime childhood friend of Dr. Singh. She will testify in person about her conversations with Dr. Singh about the sexual harassment Dr. Singh was experiencing throughout her employment at the Center. |
| 6 | Charles Anflick | In person | Mr. Anflick is Mental health professional. He treated Dr. Singh in 2017. He will testify about her conversations with Dr. Singh about the sexual harassment Dr. Singh was experiencing throughout her employment at the Center. He will also testify the effect of incidents on Dr. Singh. Dr. Singh's emotional, mental and physical health was affected by the experience at MSKCC. |
| 7 | Pooja Raj | In person | Ms. Raj is a mental health professional who works at a women's organization. She will testify the effect of incidents on Dr. Singh. She will testify about trauma, mental and physical health issues faced by Dr. Singh |
| 8 | Anusha Goossens | In person | Ms. Goossens works at a women's organization. She has been in touch with Dr. Singh since mid-2016. She will testify the effect of incidents on Dr. Singh's emotional, mental and physical health. She will also testify the complexity of problems Dr. Singh is facing because of MSKCC's reckless handling of the situation. She will testify in detail the results onward on Dr. Singh's immigration |

| | | | |
|----|--------------------------|--------------------------|---|
| | | | status and problems with finding another job and her experience in the courthouse. |
| 9 | Dr. Chloe Goldstein | In person/ deposition | Goldstein is a mental health professional. She has treated Dr. Singh since 2017. She will testify about her conversations with Dr. Singh about the sexual harassment Dr. Singh was experiencing throughout her employment at the Center. She will also testify the effect of trauma on emotional, mental and physical health. |
| 10 | Dmitry Zuykov | In Person | Mr. Zuykov is a computer professional. He will testify about her conversations with Dr. Singh about the sexual harassment and hostile work environment Dr. Singh was experiencing at the Center. He will also testify the effect of this experience on Dr. Singh's social life. |
| 11 | Dr. Rachel Ciporen | In Person | Dr. Ciporen is Executive Coach and Consultant She will testify about her conversations with Dr. Singh about the sexual harassment and hostile work environment Dr. Singh was experiencing at the Center. She will also testify the effect of this experience on Dr. Singh's health, personal life, and social life. |
| 12 | Shalu Sharma | In person | Dr. Sharma was a post-doctoral fellow at Albert Einstein College of medicine. Dr. Sharma was a coworker and they had a joint project together during Ph.D. Dr. Sharma and Dr. Singh have been in good professional bonding. She can testify Dr. Singh Ph.D. work performance at AECOM. She will testify about her conversations with Dr. Singh regarding the sexual harassment Dr. Singh was experiencing at MSKCC. |
| 13 | Robert Perry | In Person | Mr. Perry is a trained meditation teacher. He will testify about her conversations with Dr. Singh about the sexual harassment and hostile work environment at the Center. He will also testify the effect of this experience on Dr. Singh's health, personal, social life. |
| 14 | Dr. Rajendra Kumar Singh | In person/ letter | Dr. R.K. Singh is Dr. Singh's brother in law. He is Professor in the Physics department at an Indian University. He will testify about her conversations with Dr. Singh about the sexual harassment Dr. Singh was experiencing throughout her employment at the Center. He will also testify the effect of this experience on Dr. Singh's parents and other family members. |
| 15 | Dr. Steven A. | In Person/ | Dr. Porcelli is Chair of the Department of |

| | | | |
|----|----------------------|----------------------|---|
| | Porcelli | Letter | Microbiology & Immunology at AECOM. He was co-mentor and collaboration in Dr. Singh's Ph.D. program. He will provide the information about Dr. Singh's performance and funding issues during the Ph.D. program at AECOM. He will also provide limited MSKCC experience Dr. Singh was facing. |
| 16 | Dr. Paul Mohan | In Person/ Letter | Dr. Paul was a coworker. He will provide the information about conversation and experiences of sexual harassment Dr. Singh was facing during her time at MSKCC. |
| 17 | Dr. David Matthes | In Person/ Letter | Dr. Matthes was an associate professor at SJSU. He mentored Dr. Singh during her Master's program at SJSU. He will provide information regarding Dr. Singh's performance and academic potential. He has seen Dr. Singh's integrity and strength in her life challenges. He will also provide Dr. Singh's experience at MSKCC. |
| 18 | Dr. John Muschler | In Person/ Letter | Dr. Muschler was a Scientist at CPMC. He mentored Dr. Singh during her work at CPMC. He will provide information regarding Dr. Singh's performance and academic potential. Dr. Singh's had 5 publications under his supervision in 3 years of work. He will also provide Dr. Singh's experience at MSKCC. |
| 19 | Elyssa Hantov | In person | Ms. Hantov is Mental health professional. She treated Dr. Singh in 2016. She will testify about her conversations with Dr. Singh about the sexual harassment Dr. Singh was experiencing throughout her employment at the Center. She will also testify the effect of incidents on Dr. Singh. Dr. Singh's emotional, mental and physical health was affected by the experience at MSKCC. |
| 20 | Dr. Vikrant Upadhyay | In Person/ Letter | Dr. Upadhyay was a postdoc at Weill Cornell. He will provide the information about conversation and experiences of sexual harassment and hostile work environment Dr. Singh was facing during her time at MSKCC. |
| 21 | Richa Chitranshi | Letter | Ms. Chitranshi is a high school teacher in India. She is Dr. Singh's childhood school friend. She will provide the information about conversation and experiences of sexual harassment Dr. Singh was facing during her time at MSKCC. |
| 22 | Dheeraj M Tandon | In Person | Mr. Tandon is working as the CEO of a company. He has been connected with Dr. Singh due to a Meditation practice. He will provide the |

| | | | |
|----|-----------------------------------|-----------|---|
| | | | information about conversation and experiences of sexual harassment Dr. Singh was facing during her time at MSKCC. He will also testify the effect of this terrific experience on Dr. Singh's social life, mental health and on her family. |
| 23 | Subramanyam Krishna Chintalapalli | In Person | Mr. Chintalapalli is working as a Financial Analyst in a financial company. He will provide the information about conversation and experiences of sexual harassment Dr. Singh was facing during her time at MSKCC. He will also testify the effect of this terrific experience on Dr. Singh's social life and mental health. He has been witnessed Dr. Singh's ER visits and contacted by the hospitals as a contact person. He has visited Dr. Singh during her hospital visits. |
| 24 | Kunal Shah | In Person | Mr. Shah is working as a Managing Director in a financial company. He will provide the information about conversation and experiences of sexual harassment Dr. Singh was facing during her time at MSKCC. He will also testify the effect of this terrific experience on Dr. Singh's social life and mental health. He has been witnessed Dr. Singh's ER visits and contacted by the hospitals as a contact person. |
| 25 | Chantal Broaddus | In Person | Ms. Broaddus is working as a yoga trainer.. She will provide the information about conversation and experiences of sexual harassment Dr. Singh was facing during her time at MSKCC. She will also testify the effect of this terrific experience on Dr. Singh's social life and mental health. |
| 26 | Joshua Pollock | In Person | Mr. Pollock is a meditation trainer. He will provide the information about conversation and experiences of sexual harassment and hostile work environment. He will also testify the effect of this terrific experience on Dr. Singh's social life and mental health. |

2. *Defendants' Witness List*

| Order | Witness | Mode of Testimony | Summary of Testimony & Relevance to Issues on Trial |
|-------|------------------------------|-------------------|---|
| 1 | Nagavara-Kishore Pillarsetty | In person | Defendant Dr. Pillarsetty directed and supervised Plaintiff's work throughout her employment at the Center, participated in the decision to terminate Plaintiff's employment, and participated in the |

| | | | |
|---|------------------|-----------|---|
| | | | Center's investigation of her complaints. He will testify to Plaintiff's performance deficiencies, to the Center's legitimate non-retaliatory and non-discriminatory reason for terminating Plaintiff, and to the Center's reasonable, good faith investigation of Plaintiff's complaints. He will also testify to his own non-discriminatory and non-harassing treatment of Plaintiff. Dr. Pillarsetty's testimony is relevant to establish that Plaintiff was not subject to discriminatory or hostile work conditions or unwanted physical contact, to demonstrate the Center's appropriate, adequate, and good-faith investigation of and response to Plaintiff's complaints, and Defendants' legitimate non-retaliatory and non-discriminatory reason for termination. |
| 2 | Steven M. Larson | In person | Defendant Dr. Larson was head of the Steven Larson Lab, where Plaintiff worked throughout her employment at the Center. Dr. Larson monitored Plaintiff's job performance, observed interactions between Plaintiff and Defendant Pillarsetty, observed interactions between Defendant Pillarsetty and other colleagues, coauthored work with Plaintiff, participated in the decision to terminate Plaintiff's employment, received complaints from Plaintiff, and participated in the Center's investigation of Plaintiff's complaints. Dr. Larson will testify to Plaintiff's performance deficiencies, to Defendant Pillarsetty's non-discriminatory and non-harassing treatment of Plaintiff, to the substance of Plaintiff's complaints to him and his response to those complaints, to the Center's legitimate non-retaliatory and non-discriminatory reason for terminating Plaintiff, to the Center's investigation of Plaintiff's complaints, and to the Center's fair attribution of authorial credit to Plaintiff. Dr. Larson's testimony is relevant to demonstrate the Center's appropriate, adequate, and good faith investigation of Plaintiff's complaints, to demonstrate that Plaintiff was not subject to discriminatory or hostile work conditions, to demonstrate Defendants' legitimate nondiscriminatory reason for termination, and to demonstrate the absence of retaliatory animus against Plaintiff. |
| 3 | Ushma Neill | In person | Dr. Neill was Vice President of Scientific Education and Training at the Center during Plaintiff's |

| | | | |
|---|--------------------------|-----------|---|
| | | | employment. Dr. Neill received complaints and concerns from Plaintiff. Dr. Neill will testify to the substance of Plaintiff's complaints to her and of her response to those complaints. Dr. Neill's testimony is relevant to demonstrate the Center's appropriate, adequate, and good faith response to Plaintiff's complaints and to demonstrate the absence of retaliatory animus against Plaintiff. |
| 4 | April Due | In person | Ms. Due was Assistant to Defendant Dr. Larson during Plaintiff's employment at the Center. Ms. Due observed interactions between Plaintiff and Defendant Pillarsetty and arranged meetings between Plaintiff and Defendant Larson. Ms. Due will testify to the substance of Plaintiff's complaints and to Defendant Pillarsetty's non-discriminatory and non-harassing treatment of Plaintiff. Ms. Due's testimony is relevant to demonstrate the Center's appropriate, adequate, and good faith response to Plaintiff's complaints and to demonstrate that Plaintiff was not subject to discriminatory or hostile conditions at work. |
| 5 | Thomas Magaldi | In person | Mr. Magaldi was Manager of the Center's Office of Career and Professional Development during Plaintiff's employment at the Center. Mr. Magaldi received complaints and concerns from Plaintiff. Mr. Magaldi will testify to the substance of Plaintiff's complaints to him and his response. Mr. Magaldi's testimony is relevant to demonstrate the Center's appropriate, adequate and good faith response to Plaintiff's complaints and to demonstrate the absence of retaliatory animus against Plaintiff. |
| 6 | Roselinda Herard Severin | In person | Ms. Severin was the Manager of Departmental Funds of the Center's Radiology Research Labs during Plaintiff's employment. Ms. Severin was involved in addressing Plaintiff's pattern of unauthorized absences, observed interactions between Plaintiff and Defendant Pillarsetty, was contemporaneously informed of the decision to terminate Plaintiff's employment and participated in communicating that decision to Plaintiff. Ms. Severin will testify to the Plaintiff's performance deficiencies, to Defendant Pillarsetty's non-discriminatory and non-harassing treatment of Plaintiff, and to Defendants' reason for terminating Plaintiff. Ms. Severin's testimony is relevant to demonstrate Defendants' legitimate, non-discriminatory and non-retaliatory reason for |

| | | | |
|---|-----------------|-----------|--|
| | | | termination and to demonstrate that Plaintiff was not subject to discriminatory or hostile conditions at work. |
| 7 | Maria Fernandez | In person | Ms. Fernandez was a Human Resources Business Partner at the Center during Plaintiff's employment. Ms. Fernandez investigated Plaintiff's complaints on behalf of the Center. Ms. Fernandez will testify to the substance of Plaintiff's complaints and to the method and conclusions of her investigations into those complaints. Ms. Fernandez' testimony is relevant to demonstrate the Center's appropriate, adequate and good faith investigation of Plaintiff's complaints and to demonstrate the absence of retaliatory animus against Plaintiff. |
| 8 | Darren Veach | In person | Dr. Veach worked in Defendant Larson's lab during Plaintiff's employment at the Center. Dr. Veach interacted extensively with Plaintiff and frequently discussed with Plaintiff her interpersonal and scientific difficulties at work, observed interactions between Plaintiff and Defendant Pillarsetty, and observed interactions between Defendant Pillarsetty and other colleagues. Dr. Veach will testify to Plaintiff's performance deficiencies, to Plaintiff's deficient interpersonal skills, to Plaintiff's distorted perception of interactions with others, to Defendant Pillarsetty's non-discriminatory and non-harassing treatment of Plaintiff and other colleagues, to Plaintiff's failure to report complaints regarding sexual harassment or gender discrimination, and to the decline in Plaintiff's physical and mental health following a bout of dengue fever. Dr. Veach's testimony is relevant to demonstrate Defendants' legitimate, non-discriminatory and non-retaliatory reason for termination, to demonstrate that Plaintiff was not subject to discriminatory or hostile conditions at work, and to demonstrate the existence of alternative causes of the mental and emotional harms Plaintiff has allegedly experienced. |
| 9 | Philip Watson | In person | Dr. Watson worked as a researcher at the Center during Plaintiff's employment. Dr. Watson observed Plaintiff's work performance, counseled Plaintiff on her work and shared his views on Plaintiff's work with Dr. Steven Larson. Dr. Watson will testify to Plaintiff's performance deficiencies, to her unethical use of data, and to the concerns he expressed to Dr. Larson regarding Plaintiff's performance. Dr. |

| | | | |
|----|---------------------|-----------|--|
| | | | Watson's testimony is relevant to demonstrate Defendants' legitimate, nondiscriminatory and non-retaliatory reason for termination. |
| 10 | Stuart B. Kleinman | In person | Dr. Kleinman conducted a forensic psychiatric evaluation of Plaintiff. Dr. Kleinman discussed extensively with Plaintiff her psychiatric history, alleged traumas, and perceptions of Defendant Pillarsetty and Defendant MSKCC. Dr. Kleinman's testimony is relevant to demonstrate that the alleged discrimination which Plaintiff reported did not produce the associated psychiatric disorder Plaintiff claims to have. |
| 11 | Sarah Cheal | In person | Dr. Cheal worked in the Larson Lab during Plaintiff's employment. Dr. Cheal extensively interacted with Plaintiff, coauthored work with Plaintiff, observed Plaintiff's performance, and discussed with Plaintiff her interpersonal and scientific challenges at work. Dr. Cheal also observed interactions between Plaintiff and Defendant Pillarsetty and between Defendant Pillarsetty and other colleagues. Dr. Cheal will testify to Defendant Pillarsetty's non-discriminatory and non-harassing treatment of Plaintiff and other colleagues, to Plaintiff's performance deficiencies, to the substance of Plaintiff's complaints regarding work, and to the Center's equitable attribution of authorship credit to Plaintiff. Dr. Cheal's testimony is relevant to demonstrate that Plaintiff was not subject to discriminatory or hostile conditions at work, to demonstrate the absence of retaliatory animus toward Plaintiff, and to demonstrate Defendants' legitimate, non-discriminatory and non-retaliatory reason for termination. |
| 12 | Alexander Bolaender | In person | Dr. Bolaender worked as a Research Scholar at the Center in the Gabriela Chiosis Lab during Plaintiff's employment. Dr. Bolaender interacted extensively with Plaintiff and frequently discussed with Plaintiff her interpersonal and scientific difficulties at work, observed interactions between Plaintiff and Defendant Pillarsetty, and observed interactions between Defendant Pillarsetty and other colleagues. Dr. Bolaender will testify to Plaintiff's performance deficiencies, to Plaintiff's deficient interpersonal skills, and to Plaintiff's distorted perception of interactions with others. |
| 13 | Ryan Lemanski | In person | Mr. Lemanski worked at the Center as Assistant to |

| | | | |
|----|----------------|-----------|--|
| | | | Ms. Maria Fernandez during Plaintiff's employment at the Center. Mr. Lemanski had contemporaneous information regarding Ms. Fernandez' investigation into complaints made by Plaintiff. Mr. Lemanski will testify as to the substance of Plaintiff's complaints and to the method and conclusions of Ms. Fernandez' investigations into those complaints. Mr. Lemanski's testimony is relevant to demonstrate the Center's appropriate, adequate and good faith investigation of Plaintiff's complaints, and to demonstrate the absence of retaliatory animus against Plaintiff. |
| 14 | Amy Rampoldt | In person | Ms. Rampoldt worked at the Center as Vice President, Human Resources Business Partners during Plaintiff's employment at the Center. Ms. Rampoldt was contemporaneously informed of complaints made by Plaintiff, of the Center's investigation into those complaints, and of the decision to terminate Plaintiff. Ms. Rampoldt will testify to the Center's legitimate, non-retaliatory and non-discriminatory reasons for termination. Ms. Rampoldt's testimony is relevant to demonstrate Defendants' legitimate, non-discriminatory and non-retaliatory reason for termination. |
| 15 | Cindi Thaw | In person | Ms. Thaw worked at the Center as a Human Resources Business Partner during Plaintiff's employment. Ms. Thaw was contemporaneously informed of complaints made by Plaintiff, of the Center's investigation into those complaints, and of the decision to terminate Plaintiff. Ms. Thaw will testify to the Center's legitimate, non-retaliatory and non-discriminatory reasons for termination. Ms. Thaw's testimony is relevant to demonstrate Defendants' legitimate, non-discriminatory and non-retaliatory reason for termination. |
| 16 | Hilda Figueroa | In person | Dr. Figueroa worked at the Center as Administrator, Academic Administration during Plaintiff's employment at the Center. Dr. Figueroa was contemporaneously informed of complaints made by Plaintiff, of the Center's investigation into those complaints, and of the decision to terminate Plaintiff. Dr. Figueroa will testify to the Center's legitimate, non-retaliatory and non-discriminatory reasons for termination. Dr. Figueroa's testimony is relevant to demonstrate Defendants' legitimate, non-discriminatory and non-retaliatory reason for |

| | | | |
|----|--------------------|-----------|--|
| | | | termination. |
| 17 | Teja Kalidindi | In person | Mr. Kalidindi worked in Defendant Larson's lab during Plaintiff's time at the Center and was supervised by Defendant Pillarsetty. Mr. Kalidindi observed Plaintiff's work performance and Defendant Pillarsetty's treatment of Plaintiff and other persons under his supervision and had general knowledge of Defendant Pillarsetty's practices as a supervisor. |
| 18 | Kishore Gangangari | In person | Mr. Gangangari worked in Defendant Larson's lab during Plaintiff's time at the Center and was supervised by Defendant Pillarsetty. Mr. Gangangari observed Plaintiff's work performance and Defendant Pillarsetty's treatment of Plaintiff and other persons under his supervision and had general knowledge of Defendant Pillarsetty's practices as a supervisor. |
| 19 | Mitesh Patel | In person | Mr. Patel worked in Defendant Larson's lab during Plaintiff's time at the Center. Mr. Patel observed Plaintiff's work performance and Defendant Pillarsetty's treatment of Plaintiff and other persons under his supervision and had general knowledge of Defendant Pillarsetty's practices as a supervisor. |
| 20 | Rekha Soni | In person | Ms. Soni worked at the Center in Raju Chaganti Lab during Plaintiff's employment at the Center. In an email dated September 9, 2018 (MS_0000439), Plaintiff alleged to Ms. Maria Fernandez that Ms. Soni had knowledge of interactions between Plaintiff and Defendant Pillarsetty. |
| 21 | Mayur Gadiya | In person | Ms. Gadiya worked at the Center during Plaintiff's employment at the Center. In an email dated September 9, 2018 (MS_0000439), Plaintiff alleged to Ms. Maria Fernandez that Ms. Gadiya had knowledge of interactions between Plaintiff and Defendant Pillarsetty. |
| 22 | Valerie Longo | In person | Ms. Longo worked in Defendant Larson's lab during Plaintiff's employment at the Center. In an email dated September 9, 2018 (MS_0000439), Plaintiff alleged to Ms. Maria Fernandez that Ms. Longo had knowledge of interactions between Plaintiff and Defendant Pillarsetty. |
| 23 | Susanne Kossatz | In person | Dr. Kossatz worked at the Center in the Thomas Reiner Lab during Plaintiff's employment at the Center. In an email dated September 9, 2018 (MS_0000439), Plaintiff alleged to Ms. Maria Fernandez that Dr. Kossatz had knowledge of |

| | | | |
|----|-------------------|-----------|---|
| | | | interactions between Plaintiff and Defendant Pillarsetty. |
| 24 | Brandon Nemieboka | In person | Dr. Nemieboka worked at the Center in the Jason Lewis Lab during Plaintiff's employment at the Center. In an email dated September 9, 2018 (MS_0000439), Plaintiff alleged to Ms. Maria Fernandez that Dr. Nemieboka had knowledge of interactions between Plaintiff and Defendant Pillarsetty. |
| 25 | Sai Kiran Sharma | In person | Ms. Sharma worked at the Center in the Jason Lewis Lab during Plaintiff's employment at the Center. In an email dated September 9, 2018 (MS_0000439), Plaintiff alleged to Ms. Maria Fernandez that Ms. Sharma had knowledge of interactions between Plaintiff and Defendant Pillarsetty. |
| 26 | Claudia Gravekamp | In person | Dr. Gravekamp supervised Plaintiff at the Albert Einstein College of Medicine and had direct interactions with Plaintiff. Dr. Gravekamp will testify to Plaintiff's preexisting mental and emotional problems, to her deficient scientific skills and knowledge, to her deficient interpersonal skills, and to her distorted view of interactions with others. Dr. Gravekamp's testimony is relevant to demonstrate Defendants' legitimate, non-discriminatory and non-retaliatory reason for termination and to demonstrate the existence of alternative causes of the mental and emotional harms Plaintiff has allegedly experienced. |

I. DEPOSITION TESTIMONY

Defendants will use deposition transcripts for cross-examination and impeachment purposes only. Plaintiff has designated certain pages from Dr. Chloe Goldstein's ("Dr. Goldstein") deposition transcript as an exhibit (*see* P. Ex. 5) in her case-in-chief. Defendants object to Plaintiff's use of Dr. Goldstein's deposition transcript in her case-in-chief as Plaintiff has not shown that Dr. Goldstein is an unavailable witness under Rule 32(a)(4) of the Federal Rules of Civil Procedure. Defendants additionally object on the basis of unfair prejudice and hearsay under Rules 403 and 802, respectively, of the Federal Rules of Evidence.

J. EXHIBITS

1. Exhibits to be Offered by Plaintiff

| P. Ex. | Description | Objection(s) |
|--------|--|--------------|
| 1 | LOR by Dr. J. Muscher for MSKCC SINGH_000800-3 | |
| 2 | LOR by Dr. D. Matthes SINGH_000804-5 | |
| 3 | LOR by Dr. C. Gravekamp SINGH_000806-7 | |
| 4 | LOR by Dr. S. Porcelli for MSKCC SINGH_000808-9 | |
| 5 | Dr. Chloe Goldstein Deposition Transcript (Pages 81-87) | * |
| 6 | Email chain Dr. Larson with attachment [MS_0000001-15] | ** |
| 7 | Email chain KP with attachment EGFR [MS_0000016-42] | ** |
| 8 | Email chain KP with attachment-PSMA [MS_0000043-55] | ** |
| 9 | Email chain April Due with attach [MS_0000056-62] | ** |
| 10 | Email chain KP with attachment-EGFR progress [MS_0000063-72] | ** |
| 11 | Email chain KP -PC3-PIP (PSMA) [MS_0000073-77] | ** |
| 12 | Email chain KP [MS_0000078-80] | ** |
| 13 | Email chain Roselinda [MS_0000081-83] | ** |
| 14 | HR Manual MSKCC [MS_0000084-372] | ** |
| 15 | Email chain Roselinda [MS_0000404] | ** |
| 16 | Email chain KP, Teja, MS_PSMA [MS_0000405-409] | * |
| 17 | Mentorship KP and MS [MS_0000475] | ** |
| 18 | Email chain KP, MS_EGFR [MS_0000410] | ** |
| 19 | Email chain Maria F, MS [MS_0000411-412] | ** |
| 20 | Email chain Larson, MS_ [MS_0000413] | ** |
| 21 | Email chain Larson, KP_ [MS_0000476] | ** |
| 22 | Email chain Maria F, MS_ [MS_0000414] | |
| 23 | Email chain KP, MS [MS_0000417-419] | ** |
| 24 | Email chain Larson, MS [MS_0000420] | ** |
| 25 | Email chain Lab KP, MS, Teja [MS_0000423-426] | * |

| | | |
|----|--|----|
| 26 | Email chain Jose, MS-Visa [MS_0000427-438] | * |
| 27 | Email chain Maria, MS- [MS_0000444-448] | * |
| 28 | Employee agreement [MS_0000477-556] | ** |
| 29 | Investigation Maria, MS [MS_0000559-562] | * |
| 30 | Email chain Maria, MS- [MS_0000563-591] | |
| 31 | Email chain KP, MS- [MS_0000592] | |
| 32 | Email chain April Due, MS [MS_0000602-603] | ** |
| 33 | Email chain Larson, KP [MS_0000604] | ** |
| 34 | Email chain Roselinda, KP,Hilda [MS_0000609-610] | ** |
| 35 | Termination documents MS [MS_0000630-709] | * |
| 36 | Email/ AECOM Dr. C Gravekamp MS_0002755-MS_0002801 | * |
| 37 | Email chain Dr. C Gravekamp MS_0002842-MS_0002870 | |
| 38 | Email chain Larson, A Due, S Cheal MS_0000990-MS_0000995 | * |
| 39 | Email chain A Due, Roselinda, Maria MS_0000998-MS_0000999 | ** |
| 40 | Email chain A Due, Larson, KP, Mary MS_0001002-MS_0001007 | * |
| 41 | Email chain A Due, Alba MS_0001008-MS_0001010 | |
| 42 | Email chain A Due, Lab meeting MS_0001011-MS_0001012 | ** |
| 43 | Email chain A Due, Roselinda MS_0001013-MS_0001014 | ** |
| 44 | Email chain A Due, Larson, MS, Maria, Roselinda MS_0001015-MS_0001025 | * |
| 45 | Email chain A Due, MS MS_0001026 -MS_0001027 | ** |
| 46 | Email chain A Due, Elsie MS_0001028 -MS_0001031 | * |
| 47 | Email chain A Due, Roselinda, KP MS_0001032 -MS_0001037 | * |
| 48 | Email chain A Due, Larson, MS MS_0001038 -MS_0001041 | * |

| | | |
|----|---|----|
| 49 | Email chain A Due, Josh, Maria F MS_0001042 -MS_0001053 | |
| 50 | Email chain A Due, Josh, Maria F MS_0001042 -MS_0001050 | |
| 51 | Email chain Dr. Larson, April Due MS_0001051- MS_0001059 | * |
| 52 | Email chain April D, MS, Meeting SL MS_0001060- MS_0001062 | |
| 53 | Email chain April D, Lab Meeting SL MS_0001063- MS_0001068 | |
| 54 | Email chain April D, MS, Meeting SL MS_0001069 | ** |
| 55 | Email chain Dr. Larson, April Due MS_0001070 - MS_0001072 | * |
| 56 | Email chain Dr. Larson, April Due MS_0001073 - MS_0001076 | * |
| 57 | Email chain Dr. Larson, April Due MS_0001077 - MS_0001088 | * |
| 58 | Email chain Dr. Larson, April Due MS_0001089- MS_0001103 | * |
| 59 | Email chain KP , April Due MS_0001104- MS_0001117 | * |
| 60 | Email chain April D, Larson, MS MS_0001118 | ** |
| 61 | Email chain Dr. Larson, April Due MS_0001119- MS_0001135 | * |
| 62 | Email chain Dr. Larson, April Due MS_0001141 MS_0001146 | |
| 63 | Email chain April D--Lab MS_0001177- MS_0001187 | * |
| 64 | Email chain April D--Lab MS_0001200- MS_0001203 | * |
| 65 | Email chain Sarah C, S Larson MS_0001219/ MS_0001236 | |
| 66 | Email chain Dr. Larson, Ms Due ,KP MS_0001237- MS_0001272 | * |
| 67 | Email chain Dr. Larson, Ms Due ,KP MS_0001273- MS_0001274 | * |
| 68 | Email chain Dr. Larson, Mount Sinai MS_0001275- MS_0001283 | * |
| 69 | Email chain Larson, Sarah C, Leah MS_0001284- MS_0001491 | * |
| 70 | Email chain MS, Aprils D ,KP MS_0001492- MS_0001733 | |
| 71 | Biosketch Dr. Larson, KP , Email Maria F, KP MS_0001734- MS_0002283 | |
| 72 | Email chain Dr. Larson, Ms Due ,KP MS_0002301- MS_0002349 | |
| 73 | Email chain Dr. Larson, Ms Due ,KP MS_0002367- MS_0002412 | |
| 74 | Email chain Dr. Larson, Ms Due ,KP MS_0002424- MS_0002451/ MS_0002418 | * |
| 75 | Email chain Dr. Larson, Ms Due ,KP MS_0002462- MS_0002482 | |
| 76 | Email chain Dr. Larson, Ms Due ,KP MS_0002491- MS_0003795 | * |
| 77 | Email chain Dr. Larson, Ms Due ,KP MS_0003883- MS_0004295 | * |
| 78 | Report Dr. Kleinman MS_0004253- MS_0004156 | |
| 79 | MSKCC data and polices MS_0000002- MS_0000373 | |
| 80 | MSKCC polices and emails MS_0000374- MS_0000624 | |
| 81 | MSKCC polices and emails MS_0000625 | * |
| 82 | Dr. KP LOR MS_0004157- MS_0004166 | ** |
| 83 | Text MS_0004167- MS_0004168 | * |
| 84 | Email chain April due, Dr. Larson MS_0001008- MS_0001010 | * |

| | | |
|-----|--|---|
| 85 | Email Chain 7/ 6/ 2016-10/2016 MS_0001013- MS_0001055 | * |
| 86 | Email Chain 6/30/16 MS_0001056- MS_0001062 | |
| 87 | Email chain April due, Dr. Larson MS_0001069- MS_0001076 | * |
| 88 | Email chain April due, Dr. Larson MS_0001102- MS_0001103 | |
| 89 | Email chain April due, Dr. Larson MS_0001118 | |
| 90 | Email chain April due, Dr. Larson MS_0001132- MS_0001135 | |
| 91 | Email chain April due, Dr. Larson MS_0001145- MS_0001146 | * |
| 92 | Email chain April due, Dr. Larson MS_0001145- MS_0001146 | |
| 93 | Email chain April due, Dr. Larson MS_0001177- MS_0001179 | |
| 94 | Email chain April due, Roselinda MS_0001508- MS_0001511 | |
| 95 | Email chain April due, Roselinda MS_0001513- MS_0001607 | |
| 96 | Email chain April due, Roselinda MS_0001608- MS_0001611 | |
| 97 | Email chain April due, Roselinda MS_0001612- MS_0001635 | * |
| 98 | Email chain April due, Roselinda MS_0001641- MS_0001645 | * |
| 99 | Email chain Roselinda CMR MS_0001646- MS_0001671 | * |
| 100 | Email chain Roselinda CMR MS_0001713- MS_0001723 | * |
| 101 | Email chain Roselinda CMR MS_0001752- MS_0001761 | * |
| 102 | Email chain Roselinda CMR MS_0001774- MS_0001808 | |
| 103 | Email chain Roselinda CMR MS_0001823 | |
| 104 | Email chain Roselinda MS_0001838- MS_0002283 | |
| 105 | Email chain MS, KP, MS_0002301-MS_0002349/ MS_0002367 --MS_0002412/ MS_0002418-MS_0002419/ MS_0002424-MS_0002436/ MS_0002437-MS_0002447/ MS_0002448-MS_0002451/ | * |

| | | |
|-----|---|----|
| | MS_0002463-MS_0002468/ MS_0002476- MS_0002482/ MS_0002491- MS_0002640/ MS_0002641-MS_0004156 | |
| 106 | Gautam /KP MS_0002504-2506 | * |
| 107 | Email Chain Dr. KP MS_0005725-MS_0005756 | |
| 108 | LOR MS_0004157-MS_0004166 MS_0005788-MS_0005820 | |
| 109 | HR Documents MS_0004157—MS_0004252 | |
| 110 | Dr. Larson letter SINGH_0000007-SINGH_0000009 | * |
| 111 | Email Chain KP and MS SINGH_0000010-SINGH_0000012 | |
| 112 | Email Chain Dr. Chaudhary and MS SINGH_0000014-SINGH_0000032 | ** |
| 113 | Email Chain Gregory D. and MS SINGH_0000033-SINGH_0000036 | * |
| 114 | Email Chain Maria Fernadiz. and MS SINGH_0000037-SINGH_0000063 | * |
| 115 | Email Chain April Due and MS SINGH_0000064-SINGH_0000067 | |
| 116 | Email April Due-Meeting SINGH_0000068-SINGH_0000070 | |
| 117 | Email April Due-MS SINGH_0000071-SINGH_0000099 | |
| 118 | Email April Due-attachment SINGH_0000100-SINGH_0000119 | |
| 119 | Email April Due-MS SINGH_0000120-SINGH_0000134 | |
| 120 | Dr. Larson Mentorship plan for MS SINGH_0000135-SINGH_0000136 | |
| 121 | Dr. Larson LOR for PCF 2016 SINGH_0000141-SINGH_0000143 | |
| 122 | Email chain April Due PCF 2016 SINGH_0000144-SINGH_0000145 | |
| 123 | Dr. Larson LOR for CMINT 2015 SINGH_0000146-SINGH_0000148 | |
| 124 | Email chain April Due PCF 2016 SINGH_0000149 | |
| 125 | Dr. Larson Mentorship plan for MS SINGH_0000150-SINGH_0000159 | |
| 126 | Email chain April Due PCF 2016 | |

| | | |
|-----|--|----|
| | SINGH_0000160-SINGH_0000161 | |
| 127 | Dr. Larson Mentorship plan for MS SINGH_0000162-SINGH_0000163 | |
| 129 | Email chain April Due 2015-2016 SINGH_0000164-SINGH_0000210 | |
| 130 | Dr. Larson LOR SINGH_0000211-SINGH_0000213 | |
| 131 | Email chain April Due 2015-2016 SINGH_0000214-SINGH_0000233 | * |
| 132 | Email chain Lauren SINGH_0000234-SINGH_0000265 | |
| 133 | Email chain Claudia SINGH_0000266 | |
| 134 | Email chain Lauren SINGH_0000267-SINGH_0000275 | |
| 135 | Email chain John SINGH_0000276-SINGH_0000278 | |
| 136 | Email chain Lauren SINGH_0000279-SINGH_0000287 | |
| 137 | Email chain John SINGH_0000288-SINGH_0000304 | |
| 138 | Email chain Dr. Matthes SINGH_0000305-SINGH_0000347 | |
| 139 | Email chain Adam Cohen SINGH_0000348-SINGH_0000354 | * |
| 140 | Email chain Denise SINGH_0000355-SINGH_0000359 | ** |
| 141 | Email chain Catherine SINGH_0000360 & SINGH_0000356 | |
| 142 | Email chain KP SINGH_0000361-SINGH_0000461 | * |
| 143 | Email chain Emy SINGH_0000462-SINGH_0000470 | * |
| 144 | Email chain Watson SINGH_0000471-SINGH_0000477 | * |
| 145 | Email chain Dr. Larson SINGH_0000479-SINGH_0000486 | * |
| 146 | Email chain Dr. David G SINGH_0000487-SINGH_0000455 | |
| 147 | Email chain KP SINGH_0000560-SINGH_0000639 | |
| 148 | Email chain Evelyn SINGH_0000640-SINGH_0000648 | * |
| 149 | Email chain April Due SINGH_0000649-SINGH_0000653 | ** |
| 150 | Email chain Maria Fernadiz | * |

| | | |
|-----|---|----|
| | SINGH_0000654-SINGH_0000706 | |
| 151 | Email chain KP SINGH_0000708-SINGH_0000809 | * |
| 152 | Email chain Enrico SINGH_0000811-SINGH_0000815 | * |
| 153 | Email chain Maria Fernadiz SINGH_0000816-SINGH_0000818 | ** |
| 154 | Email chain KP SINGH_0000819-SINGH_0000842 | |
| 155 | Email chain Wayne SINGH_0000844-SINGH_0000845 | ** |
| 156 | Email chain April Due SINGH_0000846-SINGH_0000848 | * |
| 157 | Email chain KP SINGH_0000849-SINGH_0000861 | * |
| 158 | Email chain Hilda F SINGH_0000862-SINGH_0000874 | * |
| 159 | Email chain KP SINGH_0000875-SINGH_0000936 | * |
| 160 | Email chain Dr. Guido Wendel SINGH_0000937-SINGH_0000943 | * |
| 161 | Email chain Mayur SINGH_0000945-SINGH_0000950 | * |
| 162 | Email chain KP and Lab SINGH_0000951-SINGH_0001016 | * |
| 163 | Email chain Roselinda SINGH_0001029-SINGH_0001111 | |
| 164 | Email chain David G SINGH_0001112-SINGH_0001190 | |
| 165 | Email chain KP SINGH_0001191-SINGH_0001211 | * |
| 166 | Email chain Maria Fernadez SINGH_0001212-SINGH_0001216 | * |
| 167 | Email chain Maria KP SINGH_0001217-SINGH_0001267 | |
| 168 | Email chain Sho Fujisawa SINGH_0001268-SINGH_0001273 | * |
| 169 | Email chain P. Williams SINGH_0001274-SINGH_0001283 | * |
| 170 | Email chain Dr. P. Watson SINGH_0001284-SINGH_0001365 | * |
| 171 | Email chain KP SINGH_0001366-SINGH_0001497 | * |
| 172 | Email chain MSKCC SINGH_0001498-SINGH_0001767 | |
| 173 | Email chain Roselinda, Maria | * |

| | | |
|-----|---|---|
| | SINGH_0001768-SINGH_0001815 | |
| 174 | Email chain Adam Cohen SINGH_0001817-SINGH_0001821 | * |
| 175 | Email chain Weinjing SINGH_0001822-SINGH_0001827 | * |
| 176 | Email chain Dr. Sarah Cheal SINGH_0001828-SINGH_0001837 | * |
| 177 | Email chain Dr. Gautam Chakroborty SINGH_0001838-SINGH_0001899 | * |
| 178 | Email chain KP, Teja SINGH_0001900-SINGH_0001925 | * |
| 179 | Email chain Roselinda, David G SINGH_0001936-SINGH_0001992 | * |
| 180 | Email chain Patricia W SINGH_0001994-SINGH_0002003 | * |
| 181 | Email chain Joanne SINGH_0002005-SINGH_0002008 | * |
| 182 | Email chain Dr. S Cheal SINGH_0002010-SINGH_0002037 | * |
| 183 | Email chain Elker SINGH_0002051 SINGH_0002053 | * |
| 184 | Email chain April Due SINGH_0002055 SINGH_0002090 | * |
| 185 | Email chain Kara, Desiree SINGH_0002092 SINGH_0002095 | * |
| 186 | Email chain Ryan, Darren SINGH_0002097 SINGH_0002099 | |
| 187 | Email chain Goutam SINGH_0002102 SINGH_0002114 | * |
| 188 | Email chain Leah SINGH_0002116 SINGH_0002148 | * |
| 189 | Email chain Balu SINGH_0002149 SINGH_0002157 | * |
| 190 | Email chain Balu SINGH_0002149 SINGH_0002157 | |
| 191 | Email chain Vanden SINGH_0002161 SINGH_0002165 | * |
| 192 | Email chain KP, Darren, Blesida SINGH_0002168 SINGH_0002412 | |
| 193 | Email chain Yevgeniy SINGH_0002416 SINGH_0002418 | * |
| 194 | Email chain Andrea SINGH_0002419 SINGH_0002435 | * |
| 195 | Email chain Dr. S Cheal SINGH_0002436 SINGH_0002442 | |
| 196 | Email chain Phil W | * |

| | | |
|-----|--|----|
| | SINGH_0002450_SINGH_0002460 | |
| 197 | Email chain April Due SINGH_0002462_SINGH_0002536 | * |
| 198 | Email chain Evan, Vitaly SINGH_0002537_SINGH_0002540 | * |
| 199 | Email chain Giancotti, Sean SINGH_0002541_SINGH_0002562 | * |
| 200 | Email chain Kevin SINGH_0002563_SINGH_0002573 | * |
| 201 | Email chain Adam, Patricia, Jose SINGH_0002574_SINGH_0002580 | * |
| 202 | Email chain Leah SINGH_0002581_SINGH_0002585 | * |
| 203 | Email chain S Cheal SINGH_0002586_SINGH_0002588 | * |
| 204 | Email chain KP SINGH_0002589_SINGH_0002597 | * |
| 205 | EEOC SINGH_0002598_SINGH_0002652 | * |
| 206 | MLS documents SINGH_0002653_SINGH_0002665 | |
| 207 | Housing SINGH_0002666_SINGH_0002754 | |
| 208 | Gas leakage 2012 SINGH_0002755_SINGH_0002782 SINGH_0002784_SINGH_0002786 SINGH_0002790_SINGH_0002801 SINGH_0002842_SINGH_0002870 | |
| 209 | Email Frank G SINGH_0002783_SINGH_0002782 | |
| 210 | Email Claudia G SINGH_0002787_SINGH_0002789 | ** |
| 211 | MSKCC Incident SINGH_0002802 | * |
| 212 | J1 documents SINGH_0002803_SINGH_0002815 | * |
| 213 | Federal court document SINGH_0002816_SINGH_0002841 | * |
| 214 | Housing court document SINGH_0002871_SINGH_0002882 SINGH_0002890_SINGH_0002906 | |
| 215 | MSKCC/SKI Post doc SINGH_0002907_SINGH_0002915 SINGH_0003597_SINGH_0003605 | * |
| 216 | MS Visa documents SINGH_0002916_SINGH_0002920 | * |

| | | |
|-----|--|----|
| 217 | DOD grant review SINGH_0002921_SINGH_0002932 SINGH_0003639_SINGH_0003645 | |
| 218 | Email Chain KP SINGH_0002933_SINGH_0002972 | * |
| 219 | Email Chain April Due SINGH_0002973_SINGH_0002979 | ** |
| 220 | Email Chain KP for M. Fernadez SINGH_0002980_SINGH_0003000 | * |
| 221 | HR policy SINGH_0003001_SINGH_0003314 | * |
| 222 | Separation agreement SINGH_0003315_SINGH_0003322 | ** |
| 223 | Email chain Roselinda SINGH_0003323 | ** |
| 224 | Email chain Dr. Larson SINGH_0003324 | ** |
| 225 | Email chain KP SINGH_0003325_SINGH_0003331 | * |
| 226 | Email chain Maria, Jason SINGH_0003332_SINGH_0003333 | ** |
| 227 | Email chain KP SINGH_0003334_SINGH_0003335 | * |
| 228 | Email chain KP for M Fernandez SINGH_0003336_SINGH_0003339 | * |
| 229 | Email chain Dr. Larson SINGH_0003340 | ** |
| 230 | Email chain KP, Teja SINGH_0003341_SINGH_0003344 | * |
| 231 | Email chain Jose, Patricia SINGH_0003345_SINGH_0003356 | * |
| 232 | Email chain Maria F SINGH_0003357_SINGH_0003358 | ** |
| 233 | Email chain KP, David SINGH_0003359_SINGH_0003360 | * |
| 234 | Email chain Katherine SINGH_0003361 | ** |
| 235 | Email chain Maria SINGH_0003362_SINGH_0003367 | * |
| 236 | Employee Agreement MS 2014 SINGH_0003368_SINGH_0003447 | * |
| 237 | Email chain KP SINGH_0003448 | ** |
| 238 | Investigation summary M. Fernandez SINGH_0003449_SINGH_0003451 | ** |
| 239 | Email chain M. Fernandez, Kishore | * |

| | | |
|-----|--|----|
| | SINGH_0003452_SINGH_0003514 | |
| 240 | Hosing court documents SINGH_0003515_SINGH_0003581 SINGH_0003594_SINGH_0003596 SINGH_0003627 SINGH_0003657_SINGH_0003711 SINGH_0003801_SINGH_0003813 SINGH_0003828-SINGH_0003836 SINGH_0003850-SINGH_0004013 SINGH_0004032-SINGH_0004100 | |
| 241 | Police complaint San Francisco SINGH_0003582_SINGH_0003583 | |
| 242 | Letter to Congresswoman NYC SINGH_0003591_SINGH_0003593 | |
| 243 | LOR SINGH_0003606_SINGH_0003614 | |
| 244 | Email Chain KP, Mala, Adam Cohen SINGH_0003615_SINGH_0003616 | ** |
| 245 | LOR SINGH_0003617_SINGH_0003619 | ** |
| 246 | Letter from Sakhi SINGH_0003620_SINGH_0003621 | |
| 247 | Biosketch Giancotti SINGH_0003622_SINGH_0003626 | |
| 248 | LOR SINGH_0003628_SINGH_0003630 | ** |
| 249 | Core facility SINGH_0003631_SINGH_0003638 | * |
| 250 | Employee assistance program SINGH_0003646_SINGH_0003656 | * |
| 251 | Animal facility SINGH_0003712_SINGH_0003714 | * |
| 252 | H1B filing MS SINGH_0003715_SINGH_0003774 SINGH_0003825 | |
| 253 | MSKCC work life SINGH_0003775_SINGH_00037790 | |
| 254 | Email chain KP and job hire SINGH_0003791_SINGH_0003800 SINGH_0003814_SINGH_0003820 SINGH_0003826- SINGH_0003827 | * |
| 255 | Email chain KP and job hire SINGH_0003791_SINGH_0003800 SINGH_0003844_SINGH_0003849 | * |
| 256 | LOR KP 2016 SINGH_0003824 | ** |

| | | |
|-----|---|----|
| 257 | Email chain KP and job hire SINGH_0003791_SINGH_0003800 | |
| 258 | LOR KP SINGH_0003837_SINGH_0003843 | * |
| 259 | LOR Larson, KP SINGH_0004014_SINGH_0004027 SINGH_0004029_SINGH_0004031 SINGH_0004101_SINGH_0004104 | * |
| 260 | Federal Court documents SINGH_0004157_SINGH_0004210 | |
| 261 | Medical records SINGH_0004214_SINGH_0004584 SINGH_0004590_SINGH_0004594 SINGH_004681 | |
| 262 | FMLA-MSKCC SINGH_0004598_SINGH_0004607 | * |
| 263 | Medical-metropolitan hospital SINGH_0004616_SINGH_0004617 SINGH_0004620_SINGH_0004639 SINGH_0004750_SINGH_0004769 SINGH_0004773_SINGH_0004776 | |
| 264 | MSKCC records job MS SINGH_0004678_SINGH_0004680 | ** |
| 265 | Medical records WC-Psy SINGH_0004684_SINGH_0004689 | |
| 266 | Letter to MSKCC before EEOC SINGH_0004690 | ** |
| 267 | NYPD complaint SINGH_0004691_SINGH_0004694 | |
| 268 | Medical -Mount Sinai Beth Israel-ER Weill Cornell Psy-insurance auth. SINGH_0004695_SINGH_0004697 | |
| 269 | Medical -Institute for family health SINGH_0004698_SINGH_0004702 | |
| 270 | Medical -Bills SINGH_0004703_SINGH_0004734 SINGH_0004737_SINGH_0004744 | |
| 271 | Medical Records ER (WC) SINGH_0004745_SINGH_0004749 | |
| 272 | Medical Records referral to Psy SINGH_0004777 | |
| 273 | Medical Records ER (WC) SINGH_0004778-SINGH_00079 | |
| 274 | Medical Bills SINGH_0004780-SINGH_0004853 | |
| 275 | WC-Psy-documents SINGH_0004854-SINGH_0004859 | |
| 276 | Medical records-Mobile crisis SINGH_0004860-SINGH_0004871 | |
| 277 | Email chain-imaging facility | * |

| | | |
|-----|---|----|
| | SINGH_0004873-SINGH_0004887 | |
| 278 | Email chain-Deepak Saxena SINGH_0004888-SINGH_0004948 SINGH_0004968- SINGH_0005011 | * |
| 279 | Email chain-M Fernadez SINGH_0004949-SINGH_0004964 | * |
| 280 | LOR SINGH_0004965-SINGH_0004967 | ** |
| 281 | Email Chain Lauren-Giancotti SINGH_0005012-SINGH_0005039 | * |
| 282 | Email Chain V. Balchandran SINGH_0005041-SINGH_0005046 | * |
| 283 | Email Chain KP,Teja SINGH_0005048-SINGH_0005063 | * |
| 284 | Email Chain Patricia SINGH_0005065-SINGH_0005183 | * |
| 285 | Email Chain KP, Raj SINGH_0005185-SINGH_0005188 | * |
| 286 | Email Chain Kevin SINGH_0005190-SINGH_0005201 | * |
| 287 | Email Chain KP SINGH_0005203-SINGH_0005235 | * |
| 288 | Email Chain KP, Lab SINGH_0005237-SINGH_0005258 | * |
| 289 | Email Chain Mesurh, Core facility SINGH_0005260-SINGH_0005267 SINGH_0005323-SINGH_0005386 | * |
| 290 | Email Chain Lilly Global SINGH_0005268 | ** |
| 291 | Email Chain KP SINGH_0005270-SINGH_0005311 | * |
| 292 | Email Chain Lab SINGH_0005312-SINGH_0005322 | |
| 293 | Email Chain Josh, Maria SINGH_0005387-SINGH_0005396 | * |
| 294 | Email Chain KP SINGH_0005398-SINGH_0005438 | * |
| 295 | Email WMIC abstract submission SINGH_0005440-SINGH_0005442 | * |
| 296 | Email chain CMINT SINGH_0005445-SINGH_0005447 | * |
| 297 | Email chain Dr. Phil Watson SINGH_0005449-SINGH_0005540 | * |
| 298 | Email chain Hugho SINGH_0005542-SINGH_0005548 | ** |
| 299 | Email PCF grant submission status | |

| | | |
|-----|---|----|
| | SINGH 0005549 | |
| 300 | Email Pfizer SINGH 0005551- SINGH 0005552 | ** |
| 301 | Email Pfizer SINGH 0005551- SINGH 0005552 | |
| 302 | Email chain Blesida, Erin SINGH 0005553- SINGH 0005596 | |
| 303 | Email chain Wenjing, Goutam SINGH 0005599- SINGH 0005613 | * |
| 304 | Email chain KP SINGH 0005614- SINGH 0005620 | ** |
| 305 | Email chain Christian SINGH_0005621- SINGH_0005634 SINGH 0005654- SINGH 0005668 | * |
| 306 | Email chain KP SINGH 0005635- SINGH 0005653 | * |
| 307 | Email chain Sabrina, Blesida, Larson SINGH 0005671- SINGH 0005676 | * |
| 308 | Email chain Blesida SINGH 0005677- SINGH 0005704 | * |
| 309 | Email chain Gautom, Sushmita party SINGH 0005705- SINGH 0005711 | |
| 310 | Email chain KP SINGH 0005712- SINGH 0005756 | * |
| 311 | Email chain Lab, Susi SINGH 0005757- SINGH 0005766 | * |
| 312 | Email chain M Fernadez SINGH 0005767- SINGH 0005832 | |
| 313 | Email chain Laura L SINGH 0005833- SINGH 0005842 | * |
| 314 | Email chain Mesru, Yugeny Core Faci SINGH 0005843- SINGH 0005844 | |
| 315 | Email chain Darice SINGH 0005845- SINGH 0005847 | * |
| 316 | Email chain Rachel SINGH 0005849- SINGH 0005860 | * |
| 317 | Email chain Larson SINGH 0005861 | ** |
| 318 | Email chain Ushma SINGH 0005863- SINGH 0005889 | * |
| 319 | Email chain FMLA MSKCC SINGH 0005890- SINGH 0005900 | * |
| 320 | Email chain Kelly SINGH 0005901- SINGH 0005905 | ** |
| 321 | Email chain eBRAP SINGH 0005906- SINGH 0005910 | * |

| | | |
|-----|---|----|
| 322 | Email chain Thomas M SINGH_0005912- SINGH_0005915 | * |
| 323 | Email chain Maria F SINGH_0005916- SINGH_0005918 SINGH_0006147- SINGH_0006151 | * |
| 324 | Email chain KP SINGH_0005946- SINGH_0005949 | * |
| 325 | Email chain Grant writing training SINGH_0005959- SINGH_0005960 | ** |
| 326 | Email chain David G, KP SINGH_0005961- SINGH_0005989 | * |
| 327 | Email chain Course deadline SINGH_0005991- SINGH_0006022 | * |
| 328 | Email chain Kamini SINGH_0006024- SINGH_0006028 | * |
| 329 | Email chain PCF submission SINGH_0006029- SINGH_0006062 | * |
| 330 | Email chain Dinesh SINGH_0006063- SINGH_0006067 | * |
| 331 | Email chain Daren SINGH_0006069- SINGH_0006084 | * |
| 332 | Email chain April Due SINGH_0006085 | ** |
| 333 | Email chain Sandra SINGH_0006087- SINGH_0006090 SINGH_0006142- SINGH_0006146 | * |
| 334 | Email chain KP SINGH_0006092- SINGH_0006141 | * |
| 335 | Email chain Leah SINGH_0006174- SINGH_0006176 | ** |
| 336 | Email chain Sarah SINGH_0006177- SINGH_0006179 | * |
| 337 | Email chain Sang-Gyu SINGH_0006180- SINGH_0006183 | * |
| 338 | Email chain Gautam SINGH_0006190- SINGH_0006191 | * |
| 339 | Email chain Results Counting SINGH_0006192- SINGH_0006195 | ** |
| 340 | Email chain Eric Price SINGH_0006196 | ** |
| 341 | Email chain Kara Griffith SINGH_0006197- SINGH_0006199 | ** |
| 342 | Email chain KP, Niel Taunk SINGH_0006200- SINGH_0006217 | * |
| 343 | Email chain KP, Teja SINGH_0006222- SINGH_0006233 | |

| | | |
|-----|---|--|
| 344 | Medical records SINGH 0006236- SINGH 0006242 | |
| 345 | Medical records_WC-Elyssa SINGH 0006243- SINGH 0006272 | |
| 346 | Medical records_MLS-Eleise SINGH 0006273- SINGH 0006277 | |
| 347 | Medical records_Therapy Notes SINGH 0006278- SINGH 0006509 | |
| 348 | Finacial records SINGH 0006513- SINGH 0006604 | |
| 349 | Mental health record-Pooja Raj SI00001- SI00133 | |
| 350 | Dr.All Belilvosky drugs records (No bates) | |
| 351 | Employee health 70 th street MSKCC (No bates) records | |
| 352 | Motion physical therapy records (No bates) | |
| 353 | Dr. Alla Belilovsky Medical records (No bates) | |
| 354 | Brightpoint health records (No bates) | |
| 355 | Maxwell medicals records (No bates) | |
| 356 | Metropolitan medical records (No bates) | |
| 357 | Mount Sinai Beth Israel records (No bates) | |
| 358 | Weill Cornell Medical records (No bates) | |
| 359 | New York Presbyterian records (No bates) | |
| 360 | CYPChung Medical records (No bates) | |
| 361 | Medical records Karen Horney Clinic (No bates) | |
| 362 | Charles Anflick Notes. (No bates) | |
| 363 | Family Heath Center SINGH 0004697- SINGH 0004702 | |
| 364 | Medical records from Maxwell SINGH 0004703- SINGH 0004734 | |
| 365 | Medical records/bills SINGH 0004736- SINGH 0004871 | |
| 366 | Email Chain C.Gravekamp SINGH 0008114- SINGH 0008117 | |

| | | |
|-----|---|---|
| 367 | Medical record Smart skin dermatologist (No bates) | |
| 368 | Medical records/ ER from California (No bates) | |
| 369 | MSKCC Appointment information SINGH_0000001-SINGH_0000006 | * |
| 370 | Medical record Klienman MS_0004253-MS_0004295 | |
| 371 | Message MS_0004167-MS_0004168 | |
| 372 | Prescription drug list (No bates) | |
| 373 | Employee mental health visit in June 2016 (Before job termination) (58 street Weill Cornell) (No bates) | |
| 374 | Email chains (Diary MS) SINGH_0009001- SINGH_000906 | |
| 375 | Email Chain Housing court SINGH_0009007- SINGH_000911 | |
| 376 | Email chains Claudia G SIINGH_0008114-SINGH_0008118 | |
| 377 | Email chains Offer letter Pittsburgh U SIINGH_0008119 | |
| 378 | Texts to friends regarding KP (No bates) | |

2. *Exhibits to be Offered by Defendants*

| D. Ex. | Description | Objection(s) |
|--------|--|--------------|
| 1 | MSKCC Human Resources Policy Manual for Employees (Sept. 2012) [MS_0000084-240] | ** |
| 2 | MSKCC Code of Conduct (circa 2014) [MS_0000710-29] | ** |
| 3 | MSKCC Policy No. 103 on Reporting Compliance Concerns and Non-Retaliation effective 1/1/2009 [MS_0000115-16] | ** |
| 4 | Undated MSKCC memorandum regarding housing for SKI research fellows [SINGH_0002897] | ** |
| 5 | Online description of Research Fellow Position printed 11/28/2017 [MS_0000702-05] | ** |
| 6 | M. Singh's complete personnel file [MS_0000630-701] | ** |
| 7 | M. Singh Curriculum Vitae (circa 2015) [MS_0000697-701] | ** |
| 8 | K. Pillarsetty Curriculum Vitae and Bibliography dated 5/31/2006 [MS_0000892-99] | ** |
| 9 | S. Larson Curriculum Vitae dated 2/5/2013 [MS_0000799-808] | ** |
| 10 | S. Larson "Extramural Professional Responsibilities" [MS_0000809- | ** |

| | | |
|----|---|----|
| | 16] | |
| 11 | S. Larson performance appraisal dated [MS_0000853-55] | ** |
| 12 | Email exchange between M. Singh and C. Gravekamp dated 3/6/2012 [SINGH_0002787-88] | ** |
| 13 | Email from C. Gravekamp to M. Singh dated 3/12/2012 [SINGH_0002789] | ** |
| 14 | Email exchange between M. Singh and F. Grosveld dated 3/15/2012 [SINGH_0002783] | ** |
| 15 | Email exchange between N.V. Pillarsetty and M. Singh dated 2/20/2014, 2/21/2014, 4/3/2014, and 4/4/2014 [MS_0002829-34] | ** |
| 16 | Calendar invite for M. Singh's 4/14/2014 job talk [MS_0001726] | ** |
| 17 | Email exchange between N.V. Pillarsetty and M. dated 5/1/2014 [MS_0003774-75] | ** |
| 18 | SKI form dated 6/12/2014 [MS_0000658] | ** |
| 19 | Initial Appointment Letter dated 6/13/2014 [MS_0000657] | ** |
| 20 | SKI memorandum to M. Singh dated 6/13/2014 [MS_0000659] | ** |
| 21 | M. Singh housing contract dated 7/2/2014 [SINGH_0003568-69] | ** |
| 22 | Email from N.V. Pillarsetty to M. Singh dated 8/7/2014 [MS_0003743] | ** |
| 23 | Email chain including C. Gravekamp, M. Singh, and N.V. Pillarsetty dated 8/28/2014 [MS_0002739-40] | ** |
| 24 | Email from N.V. Pillarsetty to R. Severin dated 10/13/2014 [MS_0001653] | ** |
| 25 | Email from M. Singh to N.V. Pillarsetty dated 10/22/2014 [MS_0002712] | ** |
| 26 | Email from N.V. Pillarsetty to M. Singh forwarding information on seminar with attachment, dated 10/24/2014 [MS_0003640-42] | ** |
| 27 | Email from M. Singh to R. Yevgeniy dated 11/24/2014 [SINGH_0004879] | ** |
| 28 | Email exchange between M. Singh and N.V. Pillarsetty dated 12/4/2014 and 12/5/2014 [MS_0003609] | ** |
| 29 | Email chain among D. Gorman, R. Severin, and M. Lamothe dated 1/23/2015 [MS_0000687-88] | ** |
| 30 | Email from N.V. Pillarsetty to M. Singh dated 2/13/2015 [MS_0003570] | ** |
| 31 | Email exchange between M. Singh and N.V. Pillarsetty dated 2/17/2015 and 2/18/2015 [MS_0003564-66] | ** |
| 32 | Email exchange between N.V. Pillarsetty and M. Singh dated 3/17/2015 [MS_0003551-52] | ** |
| 33 | Email chain including N.V. Pillarsetty, G. Chakraborty, and F. Giancotti dated 3/20/2015 [MS_0002618] | ** |
| 34 | Email exchange between M. Singh and N.V. Pillarsetty dated 4/1/2015 and 4/2/2015 [MS_0003534] | ** |
| 35 | Email exchange between N.V. Pillarsetty and M. dated 4/10/2015 [MS_0003504] | ** |

| | | |
|----|---|----|
| 36 | Email exchange between N.V. Pillarsetty and M. Singh with attachment, dated 4/15/2015 [MS_0003483-86] | ** |
| 37 | Email exchange between N.V. Pillarsetty and M. Singh dated 4/17/2015, 4/18/2015, and 4/19/2015 [MS_0003413-14] | ** |
| 38 | Email exchange between N.V. Pillarsetty and M. Singh dated 4/17/2015 [MS_0003443] | ** |
| 39 | Email exchange between M. Singh and N.V. Pillarsetty dated 4/17/2015 and 4/18/2015 [SINGH_0001250] | ** |
| 40 | Email from N.V. Pillarsetty to M. Singh forwarding award opportunity, dated 5/22/2015 [MS_0003397-98] | ** |
| 41 | Email chain among M. Singh, N.V. Pillarsetty, H. Figueroa with attachment, dated 6/15/2015 [MS_0002437-47] | ** |
| 42 | Email exchange between M. Singh and N.V. Pillarsetty dated 6/16/2015 [MS_0003377] | ** |
| 43 | Email exchange between G. Chakraborty and N.V. Pillarsetty dated 7/17/2015, 7/21/2015, 7/23/2015, 7/24/2015, 8/31/2015, 9/1/2015, 10/5/2015 [MS_0002111-16] | ** |
| 44 | Email exchange between M. Singh, N.V. Pillarsetty, and M. Rossi dated 7/10/2015 and 7/23/2015 [MS_0003346-47] | ** |
| 45 | Email chain between M. Singh and N.V. Pillarsetty dated 7/24/2015 [MS_0003333] | ** |
| 46 | Email from Singh to Pillarsetty with attachment, dated 7/27/2015 [MS_0002397-99] | ** |
| 47 | Email from N.V. Pillarsetty to M. Singh with attachment, dated 7/29/2015 [MS_0003324-25] | ** |
| 48 | SKI form dated 7/30/2015, followed by meeting record dated 7/31/2015 [MS_0000681-83] | ** |
| 49 | Email exchange between M. Singh and N.V. Pillarsetty dated 8/8/2015 [MS_0002910] | ** |
| 50 | S. Larson recommendation of M. Singh for Prostate Cancer Research Program Postdoctoral Training Award dated 8/11/2015 [MS_0002239-41] | ** |
| 51 | Email from M. Singh to N.V. Pillarsetty dated 8/13/2015 [MS_0002192] | ** |
| 52 | Email from N.V. Pillarsetty to M. Singh with attachment, dated 8/13/2015 [MS_0003250-51] | ** |
| 53 | Email from M. Singh to N.V. Pillarsetty with attachment dated 8/24/2015 [MS_0002183-84] | ** |
| 54 | Email exchange between Singh and Pillarsetty dated 9/2/2015, 9/3/2015, and 9/4/2015 [SINGH_0002179-80] | ** |
| 55 | Email exchange between N.V. Pillarsetty, S. Larson, and M. Singh dated 9/9/2015 and 9/12/2015 [MS_0003208] | ** |
| 56 | Email chain among N.V. Pillarsetty, M. Singh, and P. Williams dated 10/6/2015 and 11/2/2015 [MS_0003151-54] | ** |
| 57 | S. Larson recommendation of M. Singh for Tow Foundation Postdoctoral Fellowship Grant dated 10/30/2015 [MS_0001094-96] | ** |

| | | |
|----|---|----|
| 58 | Email from D. Gregory to M. Singh with attachment, dated 10/30/2015 [MS_0002078-83] | ** |
| 59 | Email exchange between M. Singh and N.V. Pillarsetty dated 10/30/2015 [MS_0003158] | ** |
| 60 | Email from N.V. Pillarsetty to M. Singh dated 12/10/2015 [MS_0003150] | ** |
| 61 | Email exchange between M. Singh and N.V. Pillarsetty 12/24/2015 [MS_0003144-45] | ** |
| 62 | Email exchange among M. Singh, S. Larson and A. Due dated 1/11/2016 and 1/12/2016 [MS_0001129-30] | ** |
| 63 | Email exchange between N.V. Pillarsetty and M. Singh 1/21/2016 and 1/22/2016 [MS_0002007] | ** |
| 64 | Email from R. Severin to N.V. Pillarsetty with attachment, dated 1/22/2016 [MS_0001714-15] | ** |
| 65 | Email chain including M. Singh, T. Taylor, and N.V. Pillarsetty dated 1/22/2016 and 1/26/2016 [MS_0001976-77] | ** |
| 66 | Email from MSKCC Learning and Organization Development Department to M. Singh regarding courses coming due, dated 2/16/2016 [SINGH_0005997-98] | ** |
| 67 | Calendar invite for 2/26/2016 meeting with M. Singh, N.V. Pillarsetty, and S. Larson [MS_0001721] | ** |
| 68 | Email chain among D. Gorman, M. Lamothe and R. Severin dated 3/4/2016 [MS_0000684-85] | ** |
| 69 | 3/4/2016 N.V. Pillarsetty recommendation of M. Singh for Prostate Cancer Foundation Young Investigators Award; 4/11/2015 N.V. Pillarsetty recommendation of M. Singh for Tow Foundation Postdoctoral Fellowship Grant; 8/31/2015 N.V. Pillarsetty recommendation of M. Singh for Scholar's Fellowship Program; 8/12/2015 N.V. Pillarsetty recommendation of M. Singh for Prostate Cancer Research Program Postdoctoral Training Award Grant [MS_0004157-66] | ** |
| 70 | Email from Pillarsetty to Singh with attachment, dated 3/9/2016 [MS_0003087-94] | ** |
| 71 | S. Larson recommendation of M. Singh for Prostate Cancer Foundation Young Investigators Award dated 3/10/2016 [MS_0001090-92] | ** |
| 72 | Email from M. Singh to N.V. Pillarsetty dated 3/11/2016 [MS_0001903] | ** |
| 73 | N.V. Pillarsetty recommendation of. M. Singh for awards at the World Molecular Imaging Congress 2016, dated 3/11/2016 [MS_0002940] | ** |
| 74 | Email exchange between M. Singh and N.V. Pillarsetty dated 3/11/2016 and 3/12/2016 [SINGH_0005418] | ** |
| 75 | Email from A. Due to M. Singh (copying N.V. Pillarsetty) dated 3/14/2016 [MS_0001077] | ** |
| 76 | Email from N.V. Pillarsetty to M. Singh dated 3/15/2016 [SINGH_0005414] | ** |

| | | |
|-----|---|----|
| 77 | Email from A. Due to M. Singh (copying N.V. Pillarsetty), dated 3/29/2016 [MS_0001075] | ** |
| 78 | Calendar invite for 4/5/2016 meeting with M. Singh, N.V. Pillarsetty, and S. Larson [MS_0001720] | ** |
| 79 | Email exchange between J. Osborne and N.V. Pillarsetty dated 4/26/2016 [MS_0001866-67] | ** |
| 80 | Email exchange between M. Singh and N.V. Pillarsetty dated 5/16/2016 [MS_0002984-85] | ** |
| 81 | Email exchange between M. Singh and N.V. Pillarsetty dated 5/20/2016 [SINGH_0005728-29] | ** |
| 82 | Calendar invite for canceled 5/23/2016 meeting with M. Singh, N.V. Pillarsetty, and S. Larson [MS_0001719] | ** |
| 83 | Email exchange between M. Singh and N.V. Pillarsetty dated 5/31/2016 [MS_0002978] | ** |
| 84 | Calendar invite for meeting on 6/2/2016 [MS_0001180-81] | ** |
| 85 | Email from P. Watson to S. Larson dated 6/9/2016 [MS_0001253] | ** |
| 86 | Email exchange between N.V. Pillarsetty and S. Larson dated 6/23/2016 and 6/28/2016 [MS_0001796] | ** |
| 87 | Email chain among M. Singh, S. Larson and M. Fernandez dated 6/29/2016 and 7/11/2016 [MS_0000601] | ** |
| 88 | Email chain among M. Singh, M. Fernandez, A. Due, and S. Larson dated 6/30/2016 and 7/11/2016 [MS_0000602-03] | ** |
| 89 | Email dated 7/5/2016 scheduling 7/6/2016 meeting between M. Singh and S. Larson [SINGH_0002066] | ** |
| 90 | Email dated 7/5/2016 scheduling 7/6/2016 meeting between M. Singh, N.V. Pillarsetty, and R. Severin [SINGH_0002067] | ** |
| 91 | Letter notifying M. Singh of termination dated 7/6/2016 [MS_0000630] | ** |
| 92 | Minutes of 7/6/2016 meeting in M. Singh personnel file [MS_0000631] | ** |
| 93 | Calendar invite for 7/6/2016 meeting with M. Singh, N.V. Pillarsetty, and R. Severin [MS_0001718] | ** |
| 94 | Email exchange between S. Larson and A. Brown dated 7/21/2016 [MS_0001250-51] | ** |
| 95 | Email exchange between M. Singh and S. Larson dated 7/22/2016 and 7/25/2016 [MS_0001248] | ** |
| 96 | Calendar invite for 7/29/2016 call between N.V. Pillarsetty and M. Fernandez [MS_0004202] | ** |
| 97 | Email from R. Severin to N.V. Pillarsetty with attachment, dated 8/5/2016 [MS_0001697-704] | ** |
| 98 | Email exchange among M. Fernandez, C. Thaw, and R. Severin dated 8/10/2016 [MS_0001556-57] | ** |
| 99 | Email from M. Singh to M. Fernandez dated 8/11/2016 [MS_0000414] | ** |
| 100 | Email exchange between G. Guman and M. Fernandez dated 8/15/2016 [MS_0004146-47] | ** |

| | | |
|-----|--|----|
| 101 | Calendar invite for 8/16/2016 call between N.V. Pillarsetty and M. Fernandez [MS_0004203] | ** |
| 102 | Letter and documentation by Pillarsetty regarding M. Singh's performance, with notes by M. Fernandez [MS_0000585-621] | ** |
| 103 | Miscellaneous M. Fernandez investigation notes and materials [MS_0004205-18] | ** |
| 104 | Miscellaneous M. Fernandez investigation interview notes [MS_0004169-93] | ** |
| 105 | Miscellaneous M. Fernandez investigation notes and materials [MS_0004194-201] | ** |
| 106 | Email chain including M. Singh, N.V. Pillarsetty, and S. Larson dated 8/18/2016 and 8/19/2016 [MS_0001543-44] | ** |
| 107 | Email from A. Due to S. Larson with attachment, dated 8/22/2016 [MS_0001038-39] | ** |
| 108 | Email chain among M. Singh, M. Fernandez, and L. Ballantyne dated 8/22/2016 [MS_0003931-48] | ** |
| 109 | Email chain among G. Guman, R. Severin, M. Fernandez, and S. Larson dated 8/25/2016 [MS_0001539-40] | ** |
| 110 | Email chain among R. Severin, M. Fernandez, and S. Larson dated 8/25/2016 [MS_0001537] | ** |
| 111 | Email chain among G. Guman, R. Severin, M. Fernandez, S. Larson, C. Thaw dated 8/25/2016 [MS_0001535-36] | ** |
| 112 | Email from A. Due to E. Mackey with attachment, dated 8/26/2016 [MS_0001029-31] | ** |
| 113 | Email exchange between M. Fernandez and M. Singh dated 8/30/2016 and 8/31/2016 [MS_0004125-26] | ** |
| 114 | Email from M. Fernandez to S. Larson dated 8/30/2016 [MS_0004152] | ** |
| 115 | Calendar entry from M. Fernandez scheduling 9/6/2016 meeting between her and N.V. Pillarsetty [MS_0004204] | ** |
| 116 | Email exchange between R. Kushwaha and M. Fernandez dated 9/6/2016, 9/7/2016, and 9/7/2016 [MS_0000445-46] | ** |
| 117 | M. Fernandez notes on conversation with R. Kushwaha dated 9/8/2016 [MS_0000625] | ** |
| 118 | Email from M. Singh to M. Fernandez dated 9/9/2016 [MS_0000439] | ** |
| 119 | Investigation summary by M. Fernandez dated 9/15/2016 [MS_0000559-60] | ** |
| 120 | Email exchange between M. Singh and M. Fernandez dated 9/22/2016, 9/26/2016, and 9/27/2016 [SINGH_0000040-43] | ** |
| 121 | Email exchange between M. Fernandez and M. Singh with attachment dated 9/28/2016, 9/29/2016 and 9/30/2016 [MS_0004115-24] | ** |
| 122 | Email exchange among M. Fernandez, H. Figueroa, R. Severin, G. Guman, S. Larson, and N.V. Pillarsetty dated 9/29/2016 and 9/30/2016 [MS_0001679] | ** |
| 123 | Email from A. Due to R. Severin with attachment, dated 9/30/2016 [MS_0001013-14] | ** |

| | | |
|-----|---|----|
| 124 | Letter dated 5/12/2017 from EEOC to M. Singh containing 12/12/2016 EEOC Charge File [SINGH_0004609-15] | ** |
| 125 | EEOC Dismissal and Notice of Rights dated 2/24/2017 [SINGH_0004595-97] | ** |
| 126 | Email from T. Magaldi to self with attachment, dated 6/29/2017 [MS_0004253-60] | ** |
| 127 | Email from S. Larson to A. Due dated 3/20/2018 [MS_0000990-92] | ** |
| 128 | Email chain including S. Larson, S. Cheal, L. Bassity, R. Severin, and S. Chen dated 7/24/2018, 9/10/2018, 9/11/2018, and 9/12/2018 [MS_0001435-37] | ** |
| 129 | Undated U. Neill summary of interactions with M. Singh [MS_0004262] | ** |
| 130 | May 2019 update to undated U. Neill summary of interactions with M. Singh with attachment [MS_0004264-78] | ** |
| 131 | M. Singh hotline call records generated on 8/19/2018 [MS_0003967-76] | ** |
| 132 | M. Singh's medical records from MSKCC Employee Health and Wellness Services [MS_0004342-402] | ** |
| 133 | S. Kleinman forensic psychiatric report dated 2/28/2019 [MS_0004403-45] | ** |

Plaintiff consents to Defendants' counsel filing this joint document electronically via ECF by use of the e-signature below.

Dated: February 14, 2020

JONES DAY

By: s/Manisha Singh
Manisha Singh
475 Main Street, Apt. 12K
New York, New York 10044
Telephone: (718) 679-7326
manisharaj@gmail.com

By: s/Terri L. Chase
Terri L. Chase
JoAnna Tonini
250 Vesey Street
New York, New York 10281
Telephone: (212) 326-3939
Fax: (212) 755-7306
tlchase@jonesday.com
jtonini@jonesday.com

Plaintiff Pro Se

Counsel for Defendants

SO ORDERED: The Honorable George B. Daniels, U.S.D.J.